ACKNOWLEDGMENT OF COMPLETION REPORT

PETRA CHEMICAL HCl
2929 STOREY LANE
DALLAS, DALLAS COUNTY, TEXAS

Prepared for

U.S. Environmental Protection Agency
Linda Carter, Project Officer
1445 Ross Avenue
Dallas, Texas 75202

Contract No. EP-W-06-042
TDD No. TO-0001-10-07-01
WESTON W.O. No. 20406.012.001.0568.01
NRC No. 945881
FPN: N/A
CERCLIS ID: N/A
EPA OSC: Adam Adams
START-3 PTL: Heth Parnell

Submitted by

Weston Solutions, Inc.
Robert Beck, VP, P.E., Program Manager
70 NE Loop 410, Suite 600
San Antonio, Texas 78216
(210) 308-4300

31 August 2010

649151

ACKNOWLEDGMENT OF COMPLETION REPORT

1. PROJECT IDENTIFICATION

Date: 31 August 2010

To: Adam Adams, On-scene Coordinator (OSC)
U.S. Environmental Protection Agency (EPA)
Region 6, Prevention and Response Branch

Through: Linda Carter, Project Officer (PO)
EPA Region 6, Program Management Branch

Through: Robert Beck, VP, P.E., Weston Solutions, Inc. (WESTON®)
EPA Region 6, Superfund Technical Assessment and Response Team (START-3)
Program Manager

From: Heth Parnell, WESTON
EPA Region 6, START-3 Project Team Leader

Subject: Acknowledgement of Completion Report: Petra Chemical HCl
2929 Storey Lane, Dallas, Dallas County, Texas
Contract No. EP-W-06-042
TDD No. TO-0001-10-07-01
W.O. No. 20406.012.001.0568.01
NRC No. 945881
FPN N/A
CERCLIS ID N/A
Latitude 32.86217° North
Longitude 96.87718° West

Geographic coordinates of the incident location were determined by START-3 members, using the hand-held Global Positioning System (GPS) based on the World Geodetic System-1984, with accuracy estimated at less than 50-feet circular probable error.

2. SUMMARY OF ACTIONS

On 29 June 2010, the U.S. Environmental Protection Agency Region 6 Prevention and Response Branch (EPA-PRB) was notified by the National Response Center (NRC Report No. 945881) of a hydrochloric acid (HCl) release from an aboveground storage tank (AST) at the Petra Chemical Company facility, located at 2929 Storey Lane in Dallas, Dallas County, Texas.

On 28 June 2010 at 2216 hours, a release of approximately 1,000 gallons of HCl occurred from a 10,000 gallon AST, which contained approximately 6,000 gallons of HCl at the time of the incident. The incident was reportedly due to a corroded valve that released the HCl into secondary containment. HCl subsequently was leaked from the secondary containment through an unsecured drainage valve onto the ground. The potentially responsible party (PRP), Petra Chemical Company, alerted the City of Dallas Fire HAZMAT Team, who notified the NRC on 29 June 2010 at 0856 hours.

At 0915 hours on 29 June 2010, EPA-PRB notified WESTON, the EPA Region 6 START-3 contractor, to mobilize and conduct a Tier 1 response. EPA On-scene Coordinators Adam Adams and Mike McAteer arrived on-site at 1005 hours and START-3 Heth Parnell and James Beavis arrived on-site at 1030 hours. START-3 was tasked to evaluate the horizontal extent and vertical impact of the release, to document the cleanup, and to observe local, state, and federal agency activities.

The Petra Chemical Company facility is approximately 6.5 miles northwest of downtown Dallas, Texas. The company manufactures bleach and disinfectant agents for commercial and industrial applications. Commodities from the facility are transported from the facility by both truck from the south loading racks and by railcar from the north loading racks. HCl is used at the facility to titrate the bleach and disinfectant agents to the required degree of alkalinity (pH) to meet product specifications. HCl is stored in a 10,000-gallon capacity AST located to the west of the main facility building. At the time of the release, the AST contained approximately 6,000 gallons. The release occurred due to failure of a corroded valve at the base of the tank. According to the PRP, approximately 1,500 gallons of HCl was released into secondary containment. At the time of reporting to the NRC, the Dallas Fire HAZMAT Team estimated 1,000 gallons to have been released. The HCl released from secondary containment to the ground through an open rain water discharge valve. Approximately 1,200 gallons of HCl was retained by the secondary containment and approximately 300 gallons was released onto the ground. A tertiary containment consisted of a weathered earthen berm between 4 to 8 inches high constructed along the perimeter/property fence line of the Petra Chemical facility; no HCl was reported by the PRP to have breached the tertiary containment.

The PRP and their cleanup contractor (TAS Environmental) applied soda ash to the tertiary berm and the ground surface at the point of release from secondary containment to neutralize the HCl. In addition, the PRP and their contractor commenced with recovery of free phase liquids utilizing acid resistant diaphragm pumps leading to 275-gallon polyethylene totes for temporary storage. EPA and START-3 conducted perimeter air monitoring using a PAC III passive acid gas meter configured for HCl and tested the surrounding standing water outside of the property fence line for pH to assess the horizontal extent of the release.

Due to heavy rainfall, EPA and START-3 observed multiple pools of water (presumably rainwater) surrounding the release site and two stormwater discharge channels. The first discharge channel observed was located approximately 330 feet west of the release site and flowed north to Joes Creek. The second stormwater discharge channel was within the immediate vicinity of the Petra Chemical Company facility, approximately 15 feet northeast of the release site, which flows north to Joes Creek. Joes Creek is approximately 1,100 feet north of the release site and is a tributary of the Trinity River, which flows through downtown Dallas, Texas. START-3 measured the pH at both discharge channels and of the standing water downgradient of the release site outside of the tertiary containment berm. START-3 recorded pH values of between 5.5 and 6 of the water flowing in the west discharge channel and of the pooled rainwater immediately northwest (downgradient) of the release site. At the stormwater discharge channel northeast of the site and in pooled rainwater to the northeast, START-3 recorded pH values of between 10 and 13 indicative of an interjection of an alkaline compound to the water contained in the discharge channel and in water standing in pools northwest of the release site. The cause of the alkalinity of the water in this area was believed to be the result of stormwater runoff and the chemical dissolution of residual product released during the loading of railcars at the north loading rack. The high pH values recorded of the water in the northwest discharge channel and pooled rainwater northwest of the release site are not believed to be related to the HCl release, which would have lowered the pH levels in the water.

The EPA notified the Texas Commission on Environmental Quality (TCEQ) and personnel from the City of Dallas Public Works, Stormwater Management of observations made pertaining to surface water runoff pH levels. The TCEQ and the City of Dallas arrived on-site at 1220 hours

on 29 June 2010 to review the Petra Chemical Company Spill Prevention, Control, and Countermeasures (SPCC) and Stormwater Pollution Prevention Plan (SWPPP) documents and permits and to conduct an investigation independent from the EPA and unrelated to the HCl release.

The PRP and their cleanup contractor commenced with the excavation of contaminated soils at 1650 hours on 29 June 2010, utilizing 2-25 cubic yard roll on/off boxes to transport the soil off-site. The background pH of the soil within the area was obtained by the cleanup contractor and by utilizing a Fisher Scientific Accument AB15 Basic pH meter, determined it to be 6.6. Excavation was conducted at 6-inch intervals. At each interval, a sample was collected and tested for pH using the on-site Fisher Scientific Accument AB15 Basic pH meter by TAS Environmental. At completion, excavation depth ranged between 6 inches and 24 inches below ground surface (bgs). Excavation depth was determined by a satisfactory comparison of soil pH test results to the pH of the background soil sample by EPA and TCEQ. A total of 35 cubic yards of soil was excavated; it will remain on-site pending analysis prior to disposal.

At 1730 hours on 29 June 2010, the TCEQ assumed responsibility for oversight of the remainder of the cleanup activities performed by the PRP and their contractors regarding the HCl release. The TCEQ will be working with the Petra Chemical Company on permitting and discharge issues pertaining to the high pH values of stormwater runoff from the railcar loading racks. The EPA and START-3 demobilized from the site at 1745 hours on 29 June 2010.

This final report was prepared as part of the requirements of the Technical Direction Document (TDD) No. TO-0001-10-07-01 and serves as documentation of work completed to date.

3. LIST OF ATTACHMENTS

A. NRC Report No. 945881

B. START-3 Field Logbook

C. Digital Photographs

D. POLREP

E. TDD No. TO-0001-10-07-01

☐ The EPA Task Monitor did not provide final approval of this report prior to the completion date of the work assignment. Therefore, Weston Solutions, Inc. has submitted this report absent the Task Monitor's approval.

☒ The EPA Task Monitor has provided final approval of this report. Therefore, Weston Solutions, Inc. has submitted this report with the Task Monitor's approval.

Attachment A

NRC Report No. 945881

NATIONAL RESPONSE CENTER 1-800-424-8802
*** For Public Use ***
Information released to a third party shall comply with any
applicable federal and/or state Freedom of Information and Privacy Laws

Incident Report # 945881

INCIDENT DESCRIPTION

*Report taken at 09:56 on 29-JUN-10
Incident Type: STORAGE TANK
Incident Cause: EQUIPMENT FAILURE
Affected Area:
The incident occurred on 28-JUN-10 at 22:16 local time.
Affected Medium: UNKNOWN UNKNOWN

SUSPECTED RESPONSIBLE PARTY

Organization: PETRA
DALLAS, TX

Type of Organization: PRIVATE ENTERPRISE

INCIDENT LOCATION

2929 STOREY LANE County: DALLAS
City: DALLAS State: TX

RELEASED MATERIAL(S)

CHRIS Code: HCL Official Material Name: HYDROCHLORIC ACID
Also Known As:
Qty Released: 3000 GALLON(S) Qty in Water: 0 UNKNOWN AMOUNT

DESCRIPTION OF INCIDENT

CALLER REPORTED A 10,000 GALLON ACID TANK HAD A VALVE CORROSION THAT CAUSED A SPILL OF MATERIALS.

INCIDENT DETAILS

Description of Tank: STEEL
Tank Above/Below Ground: ABOVE
Transportable Container: NO
Tank Regulated: UNKNOWN
Tank Regulated By:
Tank ID:
Capacity of Tank: 10000 GALLON(S)
Actual Amount:

DAMAGES

Fire Involved: NO Fire Extinguished: UNKNOWN

INJURIES:	NO	Hospitalized:	Empl/Crew:	Passenger:
FATALITIES:	NO	Empl/Crew:	Passenger:	Occupant:
EVACUATIONS:	NO	Who Evacuated:	Radius/Area:	
Damages:	NO			

Closure Type		Description of Closure	Length of Closure	Direction of Closure	
Air:	N				
Road:	Y	STOREY RD AND DENTON DR		ALL	Major Artery: N
Waterway:	N				
Track:	N				

Passengers Transferred: NO
Environmental Impact: UNKNOWN

Media Interest: NONE Community Impact due to Material:

REMEDIAL ACTIONS

NONE
Release Secured: YES
Release Rate:
Estimated Release Duration:

WEATHER

Weather: RAINY, ºF

ADDITIONAL AGENCIES NOTIFIED

Federal: NONE
State/Local: NONE
State/Local On Scene: NONE
State Agency Number: NONE

NOTIFICATIONS BY NRC

CHEM SAFETY AND HAZARD INVEST BOARD (CSB AUTOMATIC NOTIFICATIONS)
29-JUN-10 10:00
DHS PROTECTIVE SECURITY ADVISOR (PSA DESK)
29-JUN-10 10:00
DOT CRISIS MANAGEMENT CENTER (MAIN OFFICE)
29-JUN-10 10:00
U.S. EPA VI (MAIN OFFICE)
29-JUN-10 10:03
GULF STRIKE TEAM (MAIN OFFICE)
29-JUN-10 10:00
JFO-LA (COMMAND CENTER)
29-JUN-10 10:00
NATIONAL INFRASTRUCTURE COORD CTR (MAIN OFFICE)
29-JUN-10 10:00
NOAA RPTS FOR TX (MAIN OFFICE)
29-JUN-10 10:00
TCEQ (MAIN OFFICE)
29-JUN-10 10:00
TEXAS STATE OPERATIONS CENTER (COMMAND CENTER)
29-JUN-10 10:00

ADDITIONAL INFORMATION

CALLER HAD NO ADDITIONAL INFORMATION.

*** END INCIDENT REPORT # 945881 ***

Attachment B

START-3 Field Logbook

PETRA CHEMICAL, INC.
HYDROCHLORIC ACID SPILL

"Rite in the Rain"®
ALL-WEATHER
JOURNAL
No. 391

2929 STOREY LANE
DALLAS, TX ~~79~~ 75220

TDD # TO-0001-10-07-01

NRC # 945881

WO # 20406.012/016.001.0568.01

"Rite in the Rain"®
ALL-WEATHER WRITING PAPER

Name JAMES BEAVIS (WESTON START-3)
IF FOUND PLEASE RETURN TO:
Address 14160 N DALLAS PARKWAY STE 850
DALLAS, TEXAS 75254
Phone 972-977-4383

Project PETRA HYDROCHLORIC ACID
2929 STOREY LANE, DALLAS, TX
NRC REPORT No. 945881
29-JUN-2010

TO-0001-10-07-01

Clear Vinyl Protective Slipcovers (Item No. 30) are available for this style of notebook. Helps protect your notebook from wear & tear. Contact your dealer or the J. L. Darling Corporation.

29-JUN-2010 1

CONTENTS

WO# 20406.012.001.0568.01

PAGE	REFERENCE	DATE
	SCRIBE(S) JAMES BEAVIS ~~JBB~~ JB	
2-10	field log	6/29/10
11-13	photo log	6/29/10
14	Re: TCEQ correspondance	7/2/10
15	Re: AOC	7/7/10
47&48	Business cards	N/A

WO # 20406.012.001.0568.01

TUESDAY 29-JUN-2010 PETRA HYDROCHLORIC ACID SPILL JAMES BEAVIS AND HETH PARNELL, 2929 STOREY LN, DALLAS, TX 75220

WEATHER: 82°F, EASTERLY WIND ~8mph, 89% HUMIDITY WITH 50% CHANCE OF RAIN, OVERCAST

EQUIPMENT LIST:

STYLUS 850 SW CAMERA
2 - DELL LAPTOPS W/AIR CARD
GARMIN OREGAN GPS UNIT
DRAGER PAC III ACID GAS METER
LUDLUM RAD METER MODEL 2401 RFW 23726

SCOPE OF WORK:

NRC REPORT NO. 965881 STATES THAT AT 2216 ON 28 JUN 2010 EQUIPMENT FAILURE involving an above ground storage tank lead to the release of approximately 3000 gallons of HYDROCHLORIC ACID into secondary containment. Secondary containment failed and 300 gal (approximately) spilled onto the ground. The RP is Mr. MUSGRAVE OF PETRA CHEMICAL COMPANY. The tank is 10,000 g in capacity and located at 2929 STOREY LANE, DALLAS, TX. The reporting party is STEVE HARRIS with Dallas FIR HAZMAT NRC report filed at 0956 hrs 29-JUN-10

WO. 20406.012.001.0568.01

TUESDAY 29-JUN-2010 PETRA HYDROCHLORIC ACID SPILL DALLAS, TEXAS. JAMES BEAVIS & HETH PARNELL

0915 TASK MONITOR ADAM ADAMS (EPA OSC) CONTACTS START-3 PARNELL AND REQUESTS START-3 SUPPORT. JHANA ENDERS ACTIVATES START-3 PARNELL AND BEAVIS

1005 START-3 ARRIVE AT WESTON DTX AND LOAD EQUIPMENT

1010 Depart WESTON DTX office for 2929 Storey Lane, Dallas, TX. Facility name Petra Chemical Company

1020 commence with START-3 health & safety brief Beavis & Parnell in attendance Physical Hazards - commute to/from site especially in rainy conditions. Thunderstorms are possible today, uneven surfaces, trains on railroad, pinch points

CHEMICAL HAZARDS: HCl corrosive liquid, water reactive. Inhalation, Ingestion, skin contact with vapors, reaction w/ water creates corrosive and/or flammable gases. Facility produces bleach & disinfectants for commercial & industrial use/application

Biological HAZARDS: Insects & hygiene Countermeasures: PPE, HAZCOM & training.

20406-012-001-0568-01

TUES 29-JUN-2010 PETRA CHEMICAL HYDROCHLORIC ACID SPILL, DALLAS, TX. JAMES BEAVIS & HETH PARNELL

H&S ACKNOWLEDGEMENT:

JAMES BEAVIS [signature] NO ALLERGIES

HETH PARNELL [signature] None

1030 ARRIVE AT 2929 STOREY LANE, DALLAS, TX CALL EPA OSC ADAM ADAMS. SIGN IN AT FACILITY RECEPTION

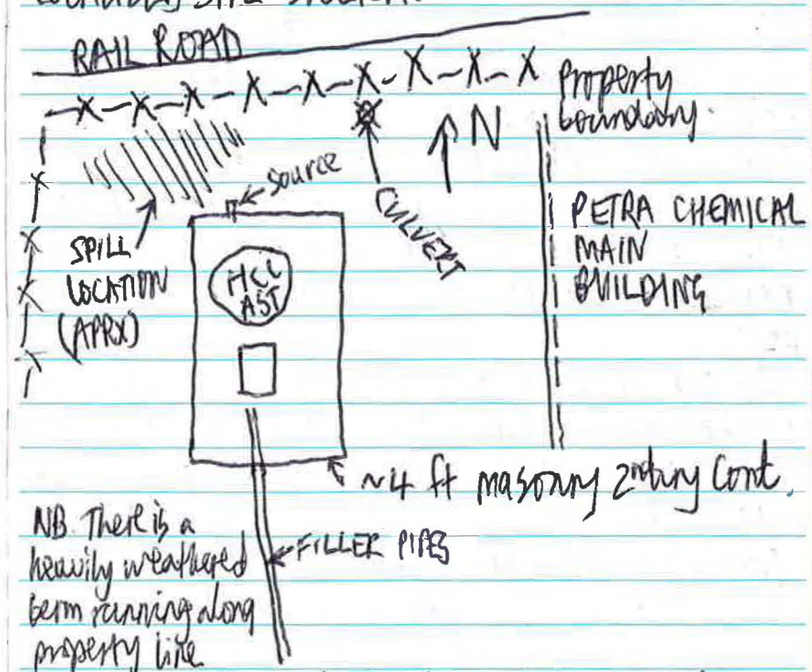
1035 COORDINATE WITH EPA ADAMS AND EPA MIKE MACATEER. TAS Environmental are the cleanup contractors for Petra. Physical Coordinates at release are as: 32.86204°N ; -96.87633°E

OBSERVATIONS Captured in the following notes and photolog (photolog can be located at end of days field log). Currently TAS ENVIRONMENTAL CONTRACTORS FOR THE RP ARE/AND HAVE CONTINUED TO RECOVER THE RELEASED MATERIAL FROM THE SURROUNDING EARTH (GRASS) NORTH OF SECONDARY CONTAINMENT USING ACID TRASH PUMPS. The RP & TAS HAVE applied Soda ash to the ground to absorb and neutralize the hydrochloric acid. Free phase Liquids from the secondary containment and outside

20406-012-001-0568-01

TUES 29-JUN-2010 Petra chemical HCL Spill Dallas, TX. James Beavis & Heth Parnell. secondary containment are being transferred to 275 gallon poly totes.

LOCALIZED SITE SKETCH:



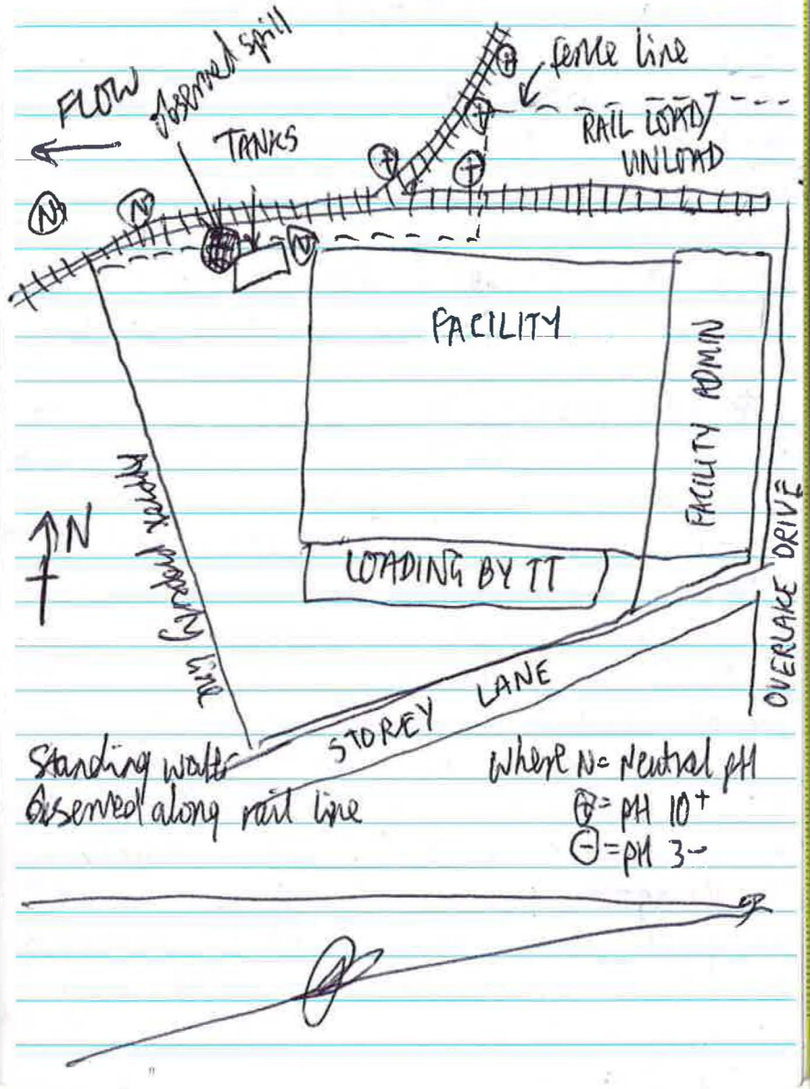
RP MUSGRAVE REPORTS THAT BASED ON AST CONTENTS ARIOR TO RELEASE THAT ~1900 GAL HAD SPILLED. OF THE 1900 gallons, 1200 was released into secondary containment and ~300 gallons leaked out of secondary containment.

20406-012-001-0568-01

TUESDAY 29-JUN-2010 PETRA CHEMICAL HYDROCHLORIC ACID SPILL. JAMES BEAVIS & HETH PARNELL Based on rain gauge 1.4" START-3 OBSERVES A TOTAL OF 14-275 GALLON TOTES. 4 OF THE TOTES APPEAR TO CONTAIN PURE PRODUCT WHICH DOES AGREE WITH THE REPORTED 1200 GALS IN SECONDARY CONTAINMENT. THE REMAINING TOTES CONTAIN RAIN WATER / HCL RUNOFF FROM THE GROUND SURFACE NORTH OF SECONDARY CONTAINMENT. THE RP STATES THAT TAS ENV. WILL BE EXCAVATING THE AFFECTED GROUND TO 6 INCHES BELOW GRADE. 1050 EPA AND START-3 TRAVEL TO THE NORTH OF THE SITE TO EVALUATE EXTENT OF OFF-SITE MIGRATION OF ACID LIQUID. START-3 TEST pH OF FREE / STANDING LIQUIDS AND pH OF WATER RUNNING IN STORM CHANNELS (see sketch overleaf). Standing water down grade of spill location shows to range between pH 5.2 - 6.5. A storm drain inside the perimeter within 25 ft east of spill pH 7.0. Immediately North east 50-100 ft of spill pH ranging from 10-12 observed indicating that a basic compound is washing from site in surface water runoff

20406-012-001-0568-01

TUESday 29-JUN-2010 PETRA CHEMICAL HYDROCHL-ACID SPILL, DALLAS. PARNELL AND BEAVIS



20406.012.001.0568.07

Tuesday 29-JUN-2010. PETRA chemical HCL spill. James Beavis & Heth Parnell. Most likely from loading area inside facility. This is not related to the incident involving HCL. EPA to notify TCEQ & City of Dallas storm water.

1220 TCEQ AND PERSONNEL FROM CITY OF DALLAS ARRIVE ON-SITE. COMMENCE WITH MEETING TCEQ REP IS MICHELLE HAVELKA. FOR BUSINESS CARDS FOR KEY PLAYERS SEE BACK PAGE OF FIELD LOG.

EPA RELAYS FINDINGS SO FAR:

- Aprox 300 gallons escaped secondary containment on to ground.
- START-3 tested pH of surrounding storm water runoff.
- Rain gauge suggest ~ 1.4" rainfall.
- Down grade of spill pH 5.5
- Storm drain in vacinity of spill ~7.0
- upgrade of spill at rail road entrance START found pH 10-12. As START progressed north toward rail loading area pH increased to 13-14
- Facility produces bleaching agents and disinfecting agents. Alkaline pH observed in runoff channel/ditch.

20406.012.001.0568.07

TUESDAY 29-JUN-10. PETRA CHEMICAL HYDROCHLORIC ACID SPILL. JAMES BEAVIS & HETH PARNELL

- JOES CREEK IS ~ 1000 FT NORTH OF FACILITY

1445 TCEQ & START-3 PARNELL COMMENCE WITH SITE WALK WITH CITY OF DALLAS. EPA & START-3 BEAVIS REVIEW SPCC & SWPPP (last updated 04/2010)

1400 TCEQ & CITY RELAY SIMILAR FINDINGS AS EPA. Issues include poor housekeeping leading to a runoff with Alkaline pH

1425 Meet with RP:

- TCEQ & RP will talk to TAS environmental to install berms to prevent the high pH water migrating into ditch. TCEQ also require TAS / RP cleanup crew to recover water in ditch (N-S) and process through the on-site waste water treatment; housekeeping issues need to be attended to as a long term solution. RP states that a lot of the water flowing through the facility lot is from community to east & across storey lane. It will be hard to contain all of the surface runoff.

1445 TAS response manager enters

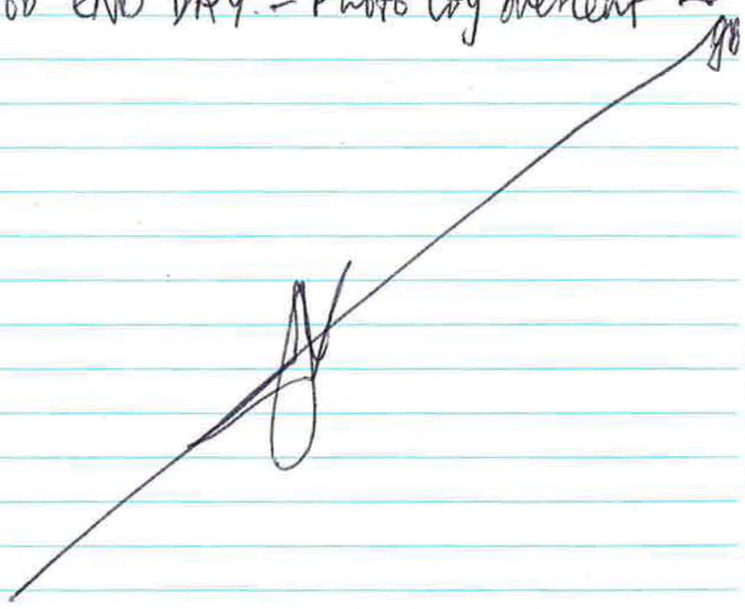
20406.012.001.0568.01

Tuesday 29-JUN-10. PETRA CHEMICAL HCL. Dallas, Texas. James Beavis & Heth Parnell Meeting and will work with RP to construct berms to prevent migration of high pH RM states that excavation is complete and would like TCEQ to give go ahead to backfill. He states that 35 cubic yards of soil were excavated.

1455 TCEQ ~~one~~ give go-ahead to backfill.

1545 EPA & START-3 Depart site for post field paperwork

1900 END DAY. - Photo log overleaf →



20406.012.001.0568.01

TUESDAY 29-JUN-10 Petra Chemical HCl Spill Dallas, Texas. James Beavis & Heth Parnell.

CAMERA ID	DATE	TIME	DESCRIPTION	DIR	PHOTO BY/ WITNESS BB/HP
P6290142	6/29/10	1041	RP cleanup contractors TAS in-progress	N	
P6290143	6/29/10	1041	Pumping HCl & water mix	N	
P6290144	6/29/10	1042	inside the AST secondary containment	E	
P6290145	6/29/10	1042	Release point in containment wall	E	
P6290146	6/29/10	1043	HCl & water & neutralization agent	NE	
P6290147	6/29/10	1043	water/HCl/absorbent agent (basic)	NW	
P6290148	6/29/10	1043	inside secondary containment	E	
P6290149	6/29/10	1044	source/point of release	E	
P6290150	6/29/10	1045	Totes used to collect released liquid	NA	
P6290151	6/29/10	1047	TAS response vehicle	NE	
P6290152	6/29/10	1047	"	NE	
P6290153	6/29/10	1047	"	NA	
P6290154	6/29/10	1052	OSC Notes taken before START arrival	NE	
P6290155	6/29/10	1052	storm water conduit west of spill site	SE	
P6290156	6/29/10	1052	Stormwater discharge channel W of site	NW	
P6290157	6/29/10	1052	AS above	NNW	
			storm water channel west of site		

20406.012.001.0568.01
TUESDAY 29-JUN-10 PETRA CHEMICAL INC. HCL SPILL, Dallas, TX. JAMES BEAVIS & HETH PARNELL

CAMERA ID	DATE	TIME	DESC	DIR	PHOTO BY/ WIT.
P6290158	6/29/10	1053	NORTH PROPERTY FENCE & SURFACE WATER	SE	JB/HP
P6290159	6/29/10	1054	pH Strip in Standing Surface Water	DOWN	
P6290160	6/29/10	1055	North fence, note absorbant (Soda Ash)	E	
P6290161	6/29/10	1057	pH Strip in Standing water pH 10+	NA	
P6290162	6/29/10	1100	AS Above	NA	
P6290163	6/29/10	1100	Rail loading area access	E	
P6290164	6/29/10	1100	Storm Water conduit pH 10+	N	
P6290165	6/29/10	1103	Foreground S.W. outlet pH 7.0	W	
P6290166	6/29/10	1104	RP Cleanup crew in progress	W	
P6290167	6/29/10	1104	Rain gauge 1.4" overnight	NA	
P6290168	6/29/10	1107	Discharge channel from Rail Loading area	W	
P6290169	6/29/10	1112	EPA Response vehicle	SW	
P6290170	6/29/10	1117	TAS ENV. Rolloff boxes for soil	N	
P6290171	6/29/10	1117	AS ABOVE	N	
P6290172	6/29/10	1126	Overview of AST	NW	

20406.012.001.0568.01
TUESDAY 29-JUN-10 PETRA CHEMICAL INC. HCL SPILL
DALLAS, TX. James Beavis & Heth Parnell

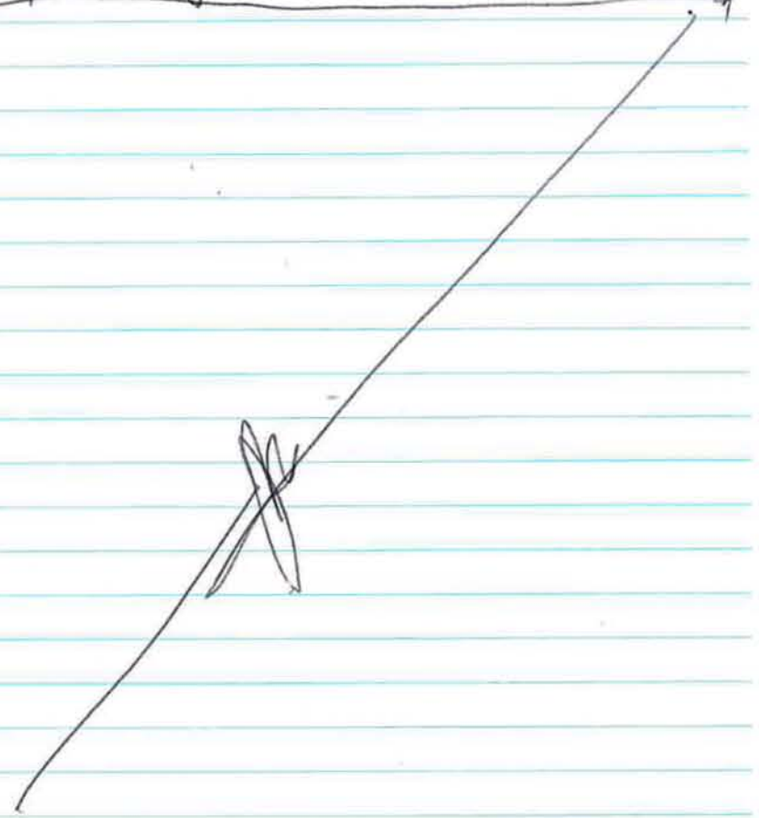
CAMERA ID	DATE	TIME	DESC	DIR	PHOTO BY/ WIT.
P6290173	6/29/10	1128	Unloading Soil Roll-off box	SE	JB/HP
P6290174	6/29/10	1136	Loading Roll-off box	N	
P6290175	6/29/10	1250	Excavation in Progress	N	
P6290176	6/29/10	1251	Roll-off boxes for soils	E	
P6290177	6/29/10	1251	Excavation in progress	W	
P6290178	6/29/10	1313	City of Dallas testing pH	NA	
P6290179	6/29/10	1322	AS Above	W	
P6290180	6/29/10	1340	Showing pH 12-05	NA	
P6290181	6/29/10	1341	High pH discharging into channel	N	
P6290182	6/29/10	1341	Runoff channel (high pH)	N	
P6290183	6/29/10	1506	Excavation complete	N	
P6290184	6/29/10	1506	AS Above	NE	

END OF PHOTO LOG

JB

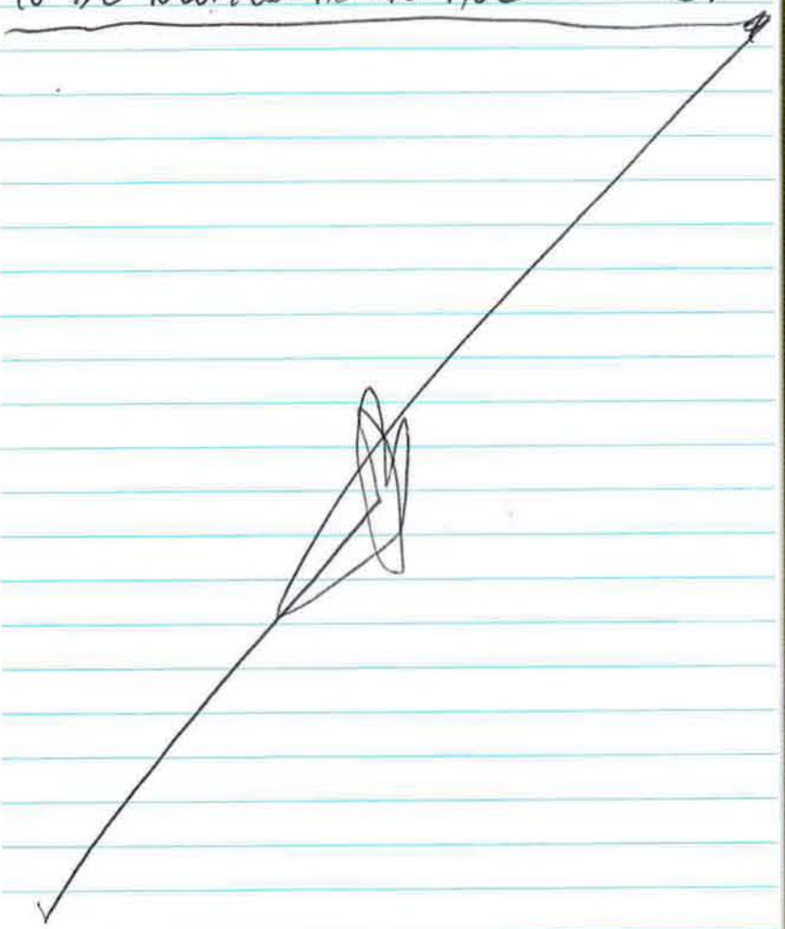
14 20406-012.001-0568-01

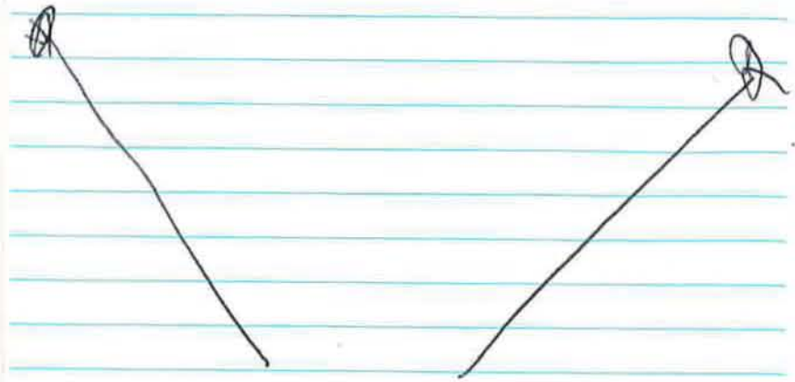
07/02/10 PETRA CHEMICAL COMPANY HCL SPILL
James Beavis & Heth Parnell →
1430 EPA ADAMS FWD. EMAIL REGARDING TCEQ FOLLOW UP AT PETRA CHEMICAL CO. FACILITY stating that TCEQ is satisfied with Response by RP Petra Chemical →



20406.012.001.0568.01 15

07/07/10 Petra Chemical Company HCL Spill
James Beavis & Heth Parnell →
1030 correspond with OSC ADAMS TO CONFIRM THAT ACTIONS RE: PETRA ARE TO BE REMOVED AS AN AOC →





END OF
FIELD LOG

47 & 48
BUSINESS
CARDS

Jeff Murriel, REM
Compliance Assurance Manager

City of Dallas

Public Works & Transportation
Storm Water Management
320 E. Jefferson Blvd., Room 108
Dallas, Texas 75203

Telephone 214-948-4014
Fax 214-948-4076
jeffery.murriel@dallascityhall.com

MICHELLE HAVELKA
Environmental Investigator
Water Program

Region 4 ■ DFW Metroplex

Texas Commission on Environmental Quality
2309 Gravel Drive, Fort Worth, TX 76118
Direct 817/588-5837 ■ Office 817/588-5800
Fax 817/588-5701
mihavelk@tceq.state.tx.us

printed on recycled paper

WESTON SOLUTIONS

JAMES L. BEAVIS
PROJECT SCIENTIST

The Trusted Integrator for Sustainable Solutions

Weston Solutions, Inc.
Suite 850
14160 N. Dallas Parkway
Dallas, TX 75254

469-374-7734
cell: 972-977-4383
fax: 469-374-7740
James.Beavis@westonsolutions.com
www.westonsolutions.com
an employee-owned company

David Sievwright
Environmental Specialist

City of Dallas

Public Works & Transportation
Stormwater Management
320 E. Jefferson Blvd., Room 108
Dallas, Texas 75203

Telephone 214-948-4064
Fax 214-948-4067
david.sievwright@dallascityhall.com

"Outdoor writing products...
...for outdoor writing people."

RECYCLABLE

"Rite in the Rain" - A unique All-Weather Writing paper created to shed water and enhance the written image. It is widely used throughout the world for recording critical field data in all kinds of weather.

Available in a variety of standard and custom printed case-bound field books, loose leaf, spiral and stapled notebooks, multi-copy sets and copier paper.

For best results, use a pencil or an all-weather pen.

a product of

J. L. DARLING CORPORATION
Tacoma, WA 98424-1017 USA
www.RiteintheRain.com

Item No. 391
ISBN: 978-1-932149-22-7

Made in the USA
US PAT NO: 6,863,940


RB27675RT


RB27675RT
BAKER
1-800-BAKER12
TAS


Mike Smith & Co.
MERGE
LEFT


TAYLOR
CENTI-METERS
INCHES
12
11
10
9
7
6
5
4
3
2
1
5.0
4.5
4.0
3.5
3.0
2.5
2.0
1.5
1.0
0.5
(1) 3JU27


TL130
1033866
ACID
SCRUBBER


R2900RT
BAKER


Oil Spill / Hazardous Materials Response
DALLAS
972-638-9700
TAS
ENVIRONMENTAL
Houston LaMarque Port Arthur New Orleans Freeport San Antonio


ACID
SCRUBBER
TANK


HQ40d
multi
12.05


ACID
SCRUBBER
TANK
9
shop-vac


HYDROCHLORIC
ACID
2
0
2
1


RB27675RT


TAKEUCHI
1033866
United Rentals
TL130
1-800-UR-RENTS
BAKER
1-800-BAKER12
TANKS / PUMPS / FILTRATION
RENTALS & SALES
RB27675 RT
DANGER
WARNING
WARNING
NISSAN


179


EPA
REGION SIX
EMERGENCY RESPONSE TEAM
0584D


SECURITY NOTICE
THIS PROPERTY IS PROTECTED BY ELECTRONIC SURVEILLANCE
NO TRESPASSING
IS UNDER 24 HOUR TV SURVEILLANCE
TRESPASSERS WILL BE PROSECUTED

Attachment D

POLREP

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Petra Chemical HCl - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #1**
Initial and Final POLREP
Petra Chemical HCl
A6X6
Dallas, TX
Latitude: 32.8620410 Longitude: -96.8763290

To:
From: Adam Adams, OSC
Date: 6/29/2010
Reporting Period: 06/29/2010

1. Introduction

1.1 Background

Site Number:		**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	PRP	**Incident Category:**	
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/29/2010	**Start Date:**	6/29/2010
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Emergency Response

1.1.2 Site Description

At 0956 hours on 29 June 2010 the U.S. Environmental Protection Agency (EPA) received notification from the National Response Center (NRC Report number 945881) that approximately 3,000 gallons of Hydrochloric Acid had spilled from a 10,000 gallon Aboveground Storage Tank (AST) due to a mechanical failure. The incident location is Petra Chemical Company, a chemical blending and packaging facility located in a light industrial area within the city of Dallas that primarily manufactures bleach and disinfectants for industrial applications. The report was made by Dallas Fire HAZMAT whom

responded and subsequently reported the incident that occurred at 2216 hours on 28 June 2010. The EPA Phone Duty Officer (PDO) activated the on-call EPA On-Scene Coordinator (OSC) and the Superfund Technical Assessment and Response Team (START). The EPA and START arrived on-site at 1030 hours on 29 June 2010.

According to the Potentially Responsible Party (PRP), the 10,000 gallon AST containing 32% HCl had released between 1,200 and 1,400 gallons of 32% HCl into secondary containment. Approximately 300 to 400 gallons of the HCl had breached secondary containment via a corroded rainwater drain cap and into the surrounding ground.

1.1.2.1 Location

The facility is owned and operated by the Petra Chemical Company located at 2929 Storey Lane, Dallas, TX 75220 in Dallas County. The approximate 90,000 square foot facility has been Petra Chemical Company for approximately 22 years.

1.1.2.2 Description of Threat

Heavy rains have been falling intermittently since the time of the release with more precipitation forecasted for the next several days. A HCl runoff into a water drainage canal directly behind the facility is probable if the released material is not contained and recovered of in a timely manner.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Off-site runoff water measured pH values ranging from 5 to 13, with the majority of measurements around pH 10. On-site assessment found two separate areas of concern regarding pH measurements in two separate areas of the facility, the HCl release on the west side of the facility with a low pH and the loading area on the north side of the facility with a high pH, both of which impacted the drainage canal to the northwest of the facility along the tracks.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA arrived on-site to conduct an investigation on the morning of 29 June, 2010. During the course of the investigation, EPA along with representatives from TCEQ and the City of Dallas discovered significant amounts of facility runoff water with pH values greater than 10 and as high as 13. Runoff water discharged is drained from site through an underground pipe system which is discharged into a drainage ditch at the back of the facility. The high pH runoff water was traced back to the facility's tanker railcar loading rack on the north side of the facility and the truck offloading area located on the south side of the facility.

2.1.2 Response Actions to Date

At the time of EPAs arrival, PRP cleanup contractors were completing the process of removing HCl solution from the secondary containment and making preparations to recover impacted soils and impacted liquid from outside the secondary containment. The area of soil impacted outside the containment wall was then drained and removed to a depth of 6-12 inches. Soil samples were taken and tested on site for pH during the excavation process to evaluate extent of excavation required based on pH values outside the range of 6 to 9.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The PRP is Petra Chemical Company located at 2929 Storey Lane, Dallas County, Dallas, TX.

2.1.4 Progress Metrics

Per the PRP and PRP Contractor, approximately 35 cubic yards of soil were excavated and stored in rolloff boxes for disposal. Approximately 1,200 to 1,400 gallons of HCl contaminated

liquids were recovered and stored in 13 totes (250 to 300 gallon capacity) for treatment/reuse by Petra Chemical Company. Approximately 2 totes were also filled with contaminated liquids from outside the secondary containment area and will also be assessed and processed by Petra Chemical Company either for reuse or disposal.

2.2 Planning Section

2.2.1 Anticipated Activities

The excavated area will be backfilled with clean soil. The water in the drainage canal impacted by the high pH runoff will be collected using a vacuum truck. An earthen dam or containment mechanism will also be placed on-site to prevent facility runoff water from entering the canal in the short term. PRP indicated a more permanent means to contain runoff from the site will be conducted to prevent future off-site impacts from the facility.

2.2.1.1 Planned Response Activities

PRP was asked to submit a plan to correct the high pH runoff. EPA will work with state and local officials to insure corrective actions are completed.

2.2.2 Issues

Chances of heavy rain are possible in the next few days.

2.3 Logistics Section

2.4 Finance Section

2.5 Safety Officer

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

Agencies involved in the response include EPA, TCEQ, and the City of Dallas.

3.2 Cooperating and Assisting Agencies

4. Personnel On Site

Personnel on-site include the PRP, PRP Response Contractor, EPA, TCEQ, and City of Dallas.

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

Additional information can be obtained from the website www.epaosc.org/PetraChemicalHCl.

6.2 Reporting Schedule

No additional POLREP's will be completed.

7. Situational Reference Materials

Attachment E

TDD No. TO-0001-10-07-01

EPA
U.S. EPA
Washington, DC 20460

START3
Technical Direction Document

Response Activities- REMOVAL
Funds (0001)
Weston Solutions, Inc.

TDD #: TO-0001-10-07-01
Contract: EP-W-06-042

! = required field

TDD Name:	Petra Chemical HCl	! Period:	Base Period
! Purpose:	Work Assignment Initiation	Verbal Date:	06/29/2010
! Priority:	High	! Start Date:	06/29/2010
Overtime:	Yes	! Completion Date:	09/30/2010
! Funding Category:	Removal	Invoice Unit:	
! Project/Site Name:	Petra Chemical HCl	WorkArea:	RESPONSE ACTIVITIES
Project Address:	2929 Storey Lane	Activity:	Emergency Response
County:	Dallas	Work Area Code:	
City, State:	Dallas, TX	Activity Code:	RV
Zip:	75220	EMERGENCY CODE:	☐ KAT ☐ RIT
! SSID:	A6X6	FPN:	
CERCLIS:		Performance Based:	No
Operable Unit:			

Authorized TDD Ceiling:	Cost/Fee	LOE (Hours)
Previous Action(s):	$0.00	0.0
This Action:	$5,000.00	0.0
New Total:	$5,000.00	0.0

Specific Elements More specifically the contractor shall, - Collect facts regarding the discharge or release to include its source and cause, - Identify potentially responsible parties, - Analyze the nature amount and location of discharged or released materials, - Observe and document federal state and private actions taken to conduct a response action

Description of Work:
All activities performed in support of this TDD shall be in accordance with the contract and TO PWS.
Contractor shall conduct a Tier 1 response, document response in a logbook, photo document response, provide an AOC report with supporting documentation, and provide response support with website and field activity.

Accounting and Appropriation Information

SFO: 22

Line	DCN	IFMS	Budget/ FY	Appropriation Code	Budget Org Code	Program Element	Object Class	Site Project	Cost Org Code	Amount
1	RVC047	XXX	09	TCD	6A00E	302DC6C	2505	A6X6RV00	C001	$5,000.00

Funding Summary:	Funding
Previous:	$0.00
This Action:	$5,000.00
Total:	$5,000.00

Funding Category
Removal

Section
- Signed by Adam Adams/R6/USEPA/US on 06/30/2010 02:05:54 PM, according to Cheng Wei Feng/star
: Adam Adams **Date:** 06/30/2010
Project Officer Section - Signed by Cora Stanley/R6/USEPA/US on 07/01/2010 11:31:30 AM, according to C

Project Officer: Cora Stanley **Date:** 07/01/2010

Contracting Officer Section - Signed by Cora Stanley/R6/USEPA/US on 07/01/2010 11:31:30 AM, according

Contracting Officer: Cora Stanley **Date:** 07/01/2010

Contractor Section - Signed by Robert Beck/start6/rfw-start/us on 07/02/2010 07:42:33 AM, according to

● No
○ Yes

During the past three (3) calendar years has your company, or any of your employees that will be working at this site, previously performed work at this site /facility?

Contractor Contact: Robert Beck **Date:** 07/02/2010